

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ROBYN WILLIAMS, individually and
on behalf of all others similarly situated,

Plaintiff,

-against-

SPIN MASTER LTD.,
a Canadian Corporation,

Defendant.

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Case No. 07 CV 6387

THE HONORABLE DAVID H. COAR
MAGISTRATE JUDGE NOLAN

**DECLARATION OF HAYDEN LEACOCK IN OPPOSITION TO
PLAINTIFF'S MOTION TO PRESERVE EVIDENCE**

I, Hayden Leacock, declare that the following is true and correct under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am employed by Spin Master, Ltd. ("Spin Master"), the defendant in this action. My title is Global IT Operations Manager. Except where otherwise indicated, the following facts are true of my own knowledge and, if called to do so, I could and would testify to the truth thereof.

2. In my capacity as Global IT Operations Manager, as described above, I oversee archiving of all electronic data and documents of Spin Master, including its storage of back-up tapes that replicate the company's electronic information.

3. So as to preserve any electronic information or documents that relate to, describe, or reference Aqua Dots products, Spin Master is preserving its back-up tapes of electronic files, including those stored in mailboxes, server drives and network drives, excluding only those materials in France and the United Kingdom, where Aqua Dots were not marketed by Spin

Master. As part of these efforts, Spin Master has ceased its normal periodic recycling of electronic copies of older back-up tapes, other than those in France and the United Kingdom.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at TORONTO, ONTARIO this 11th day of December 2007.



HAYDEN LEACOCK